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October 13, 2022

**By ECF**

The Honorable Loretta A. Preska  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *United States v. Adedayo John et al.*, 21 Cr. 609 (LAP)

Dear Judge Preska:

I write on behalf of defendant Oluwadamilola Akinpelu to respectfully request permission for Ms. Akinpelu to travel to Kansas City, Missouri, for the purpose of visiting her sister, who recently gave birth. Ms. Akinpelu plans to travel by air to Kansas City and stay with her sister from October 21 to 24, 2022. She will make her exact location known to Pretrial Services before traveling. Should the Court grant this request, Ms. Akinpelu respectfully asks the Court to temporarily lift the condition prohibiting her from being in the vicinity of airports for the purpose of this trip.

I have conferred with Pretrial Services Officer Ashley Cosme, who informs me that her office has no objection to this request. I have also conferred with counsel for the government, Kaylan Lasky, who defers to Pretrial Services. It should be noted that Ms. Akinpelu has a history of perfect compliance with the conditions of her pretrial release and that, based on her history of compliance, Pretrial Services has recommended in the past that the location monitoring condition be lifted. Thank you for your attention to this matter.

Respectfully submitted,



Ezra Spilke

cc: Oluwadamilola Akinpelu, by email  
Ashley Cosme, Pretrial Services, by email  
All counsel of record, by ECF

Defendant's requested modifications to the conditions of supervised release for the purposes of travel to Kansas City from October 21 through 24 is granted, provided that Defendant provides to Pretrial Services the details of her travel plans and anticipated whereabouts to the satisfaction of Pretrial Services.

SO ORDERED.

Dated: October 14, 2022  
New York, New York



LORETTA A. PRESKA  
Senior United States District Judge